

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

NATURAL RESOURCES DEFENSE	)	
COUNCIL, INC.,	)	
	)	
Plaintiff,	)	
	)	
v.	)	
	)	
UNITED STATES	)	Civil Action No. 20-cv-10382
ENVIRONMENTAL PROTECTION	)	
AGENCY,	)	
	)	
Defendant.	)	
	)	

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**STIPULATION**

1. On December 9, 2020, plaintiff Natural Resources Defense Council (NRDC) filed the Complaint in this matter. In its Complaint, NRDC alleges that defendant United States Environmental Protection Agency (EPA) is violating the Freedom of Information Act by failing to timely disclose responsive records that NRDC requested regarding the contamination of Americans' drinking water with perchlorate. Compl., ECF No. 1, ¶ 1.

2. NRDC and EPA have since met and conferred to set a production schedule for the documents NRDC seeks. NRDC and EPA have agreed on the following partial production schedule:

- a. By April 7, 2021, EPA and NRDC will meet and confer to discuss production of responsive records housed in the Lotus Notes email

system, other electronic records not transmitted by email, and hard-copy records.

- b. By April 14, 2021, EPA and NRDC will propose to the Court a final production deadline for any remaining documents, along with a log of any withheld records.
- c. By April 16, 2021, EPA will produce the next tranche of Outlook records to NRDC.

3. The parties respectfully request that the Court So-Order this partial production schedule.

Dated: March 25, 2021

s/ Lauren P. Phillips  
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*Counsel for Defendant*

SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2021.

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Hon. Edgardo Ramos  
United States District Judge